

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW HAMPSHIRE**

*
Re: Brian Goodman, Sr. * Case No.: 25-10233-KB
* Chapter 13
*
Debtor(s) *
*

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US Bank Trust, NA *
Movant * Hearing Date: 9/24/2025
v. * Hearing Time: 10:00 A.M.
*
Brian Goodman, Sr. *
Respondent *
*

ASSENTED MOTION TO CONTINUE

NOW COMES, Kathleen E. McKenzie, Esquire, Attorney for the Debtor in the above-captioned matter, and Respectfully Requests that this Honorable Court continue the Debtor's Hearing and in support thereof says:

1. That this matter is scheduled for a Preliminary Hearing on September 24, 2025 at 10:00 a.m.
2. That the parties are working to resolve the matter and believe a brief continuance is sufficient.
3. That Movant's Counsel, Joseph Dolben, Esq. has been contacted and has no objection to a continuance to the next available Court date, however states that the Debtor needs to provide the September mortgage payment in the amount of \$1,330.45 and additionally provide the October mortgage payment in the amount of \$1.330.45 within the grace period.
4. That there will be no prejudice to any party from a continuance to the next available Court date.
5. That Lawrence P. Sumski, the Chapter 13 Trustee, states that he has no objection to a continuance to the next available Court date as he has no interest in the Motion for Relief.

WHEREFORE, the Debtor's Attorney Respectfully Requests that this Honorable Court:

- A. Grant this Continuance to the next available Court date; and

B. For such other and further relief as is deemed fair, just and equitable.

Respectfully submitted,

Dated: September 23, 2025

/s/ Kathleen E. McKenzie, Esq.
Kathleen E. McKenzie, Esquire
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